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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TELECOM BUSINESS SOLUTION, LLC, LATAM TOWERS, LLC, and

AMLQ HOLDINGS (CAY) LTD.,

No. 22-cv-1761-LAK

Petitioners,

v. :

TERRA TOWERS CORP., TBS MANAGEMENT, S.A., and DT HOLDINGS, INC.,

Respondents.

## [PROPOSED]-ORDER FOR RELEASE OF RESTRICTED DOCUMENTS

WHEREAS, pursuant to Court orders, various documents have been filed under seal in this action and are restricted to selected parties; and

WHEREAS, non-parties Telecom Business Solution S.R.L., Continental Towers Peru, S.R.L., Collocation Technologies Peru, S.R.L., Magali Marino Ascarrunz, and Alejandro Garzaro Perez (the "Peru Non-Parties") filed their Notice of Appearance on May 5, 2025 (ECF Nos. 296-297); and

WHEREAS, the Peru Non-Parties have appeared for the limited purpose of contesting the Court's Memorandum Opinion Granting Anti-Suit Injunction and Coercive Civil Contempt Remedies (the "Injunction") (ECF No. 295) as it pertains to them; and

WHEREAS, it is necessary for the Peru Non-Parties to have access to all documents filed in this action in connection with the Injunction;

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NOW, THEREFORE, the Clerk of Court is directed to add the Peru Non-Parties to the selected parties list and/or take whatever steps are required to allow the Peru Non-Parties access to all documents filed in this action.

IT IS SO ORDERED

Dated 6 9 25

Lewis A. Kaplan

United States District Judge Southern District of New York